

From: "Eron Dodak" <edodak@integral-corp.com>
To: "Novak, Madi" <Novak.Elisabeth@epa.gov>
CC: "Michael PINTO" <michael.pinto@total.com>
Date: 3/25/2021 6:26:22 AM
Subject: RE: Arkema - Field Change Request Form FCR-01

Hi Madi,

Approximately half of the wells slated for sampling are not part of the current upland groundwater monitoring program. That said, some of the wells in the current groundwater monitoring program have been redeveloped recently, resulting in little reduction in turbidity using low-flow sampling protocols. This is consistent with our experience at other sites with wells exhibiting elevated turbidity at very low pumping rates: there is generally little benefit to redeveloping the wells. The turbidity issue at the site has been acknowledged by DEQ; they do not require sampling of turbid wells (i.e., turbidity >5 NTUs) for some COCs. Also, redeveloping wells would add a month or more to the Q2 groundwater sampling schedule required under the DEQ Order.

The monitoring event is nearly half done. We recommend continuing the protocols for collecting total and filtered samples from wells with turbid groundwater for the reasons listed above. Once we receive the data, we can jointly decide on whether the data meet our design use objectives.

Please let us know if this approach is acceptable to you or if you would like to set up a meeting to discuss the issue. Thanks!

ERON DODAK

Tel: 503.943.3614 | Cell: (b) (6)

INTEGRAL CONSULTING INC.

From: Novak, Madi <Novak.Elisabeth@epa.gov>
Sent: Wednesday, March 24, 2021 8:55 AM
To: Eron Dodak <edodak@integral-corp.com>
Cc: Michael PINTO <michael.pinto@total.com>
Subject: RE: Arkema - Field Change Request Form FCR-01

Thank you Eron,

Are there any monitoring wells that are going to be sampled that are not part of the current upland groundwater monitoring program? If so, it may be that these wells haven't been sampled for many years and redevelopment could reduce or eliminate the turbidity issue. Would you let me know if you have any wells that fall into this category?

Thank you,
Madi

From: Eron Dodak <edodak@integral-corp.com>
Sent: Monday, March 22, 2021 4:27 PM
To: Novak, Madi <Novak.Elisabeth@epa.gov>
Cc: Michael PINTO <michael.pinto@total.com>
Subject: RE: Arkema - Field Change Request Form FCR-01

Hi Madi,

Attached is the updated field change request form based on our discussion this afternoon. Please let me know if you have any questions.

Thanks!

ERON DODAK

Tel: 503.943.3614 | Cell: (b) (6)

INTEGRAL CONSULTING INC.

From: Eron Dodak

Sent: Wednesday, March 17, 2021 10:23 AM

To: 'Novak, Madi' <Novak.Elisabeth@epa.gov>

Cc: 'Michael PINTO' <michael.pinto@total.com>

Subject: Arkema - Field Change Request Form FCR-01

Hi Madi,

Attached for your review is a field change request for collecting total and dissolved samples for groundwater that has elevated turbidity.

Please let me or Mike Pinto know if you have any questions or concerns about this request. Thanks!